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5 Attorneys for GMAC MORTGAGE, LLC
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9 UNITED STATES BANKRUPTCY COURT
10 WESTERN DISTRICT OF WASHINGTON - TACOMA DIVISION

11 In re

12 STEPHEN ROGER NELSON AND TRACEY
13 MICHELLE NELSON,

14 Debtor(s).

Case No. 09-48086-PBS

Chapter 7

GMAC MORTGAGE, LLC'S REQUEST FOR
SPECIAL NOTICE AND SERVICE OF PAPERS
AND RESERVATION OF RIGHTS

15
16 TO UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL INTERESTED
17 PARTIES

18 PLEASE TAKE NOTICE that the firm of PITE DUNCAN LLP, attorneys
19 for GMAC Mortgage, LLC hereby requests special notice of all events relevant to
20 the above-referenced bankruptcy and copies of all pleadings or documents filed in
21 relation to the above-referenced bankruptcy, including all pleadings or notices
22 under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any
23 adversary proceedings, the filing of any requests for hearing, objections, and/or
24 notices of motion, or any other auxiliary filings, as well as notice of all
25 matters which must be noticed to creditors, creditors committees and parties-in-
26 interest and other notices as required by the United States Bankruptcy Code and
27 Rules and/or Local Rules of the above-referenced bankruptcy court.

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REQUEST FOR SPECIAL NOTICE

1 PITE DUNCAN LLP, requests that for all notice purposes and for
2 inclusion in the Master Mailing List in this case, the following address be used:

3 Jesse Baker
4 PITE DUNCAN LLP
5 4375 Jutland Drive, Suite 200
6 P.O. Box 17933
7 San Diego, CA 92177-0933

8 Neither this Request for Special Notice nor any subsequent
9 appearance, pleading, claim, proof of claim documents, suit, motion nor any
10 other writing or conduct, shall constitute a waiver of the within party's:

11 a. Right to have any and all final orders in any and all non-core
12 matters entered only after de novo review by a United States District Court
13 Judge;

14 b. Right to trial by jury in any proceeding as to any and all
15 matters so triable herein, whether or not the same be designated legal or private
16 rights, or in any case, controversy or proceeding related hereto, notwithstanding
17 the designation or not of such matters as "core proceedings" pursuant to 28
18 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute
19 or the United States Constitution;

20 c. Right to have the reference of this matter withdrawn by the
21 United States District Court in any matter or proceeding subject to mandatory or
22 discretionary withdrawal; and

23 d. Other rights, claims, actions, defenses, setoffs, recoupments
24 or other matters to which this party is entitled under any agreements at law or
25 in equity or under the United States Constitution.

26 All of the above rights are expressly reserved and preserved by this
27 party without exception and with no purpose of confessing or conceding
28 jurisdiction in any way by this filing or by any other participation in these
matters.

Dated: November 6, 2009

PITE DUNCAN LLP

1 /s/ Jesse Baker

JESSE BAKER, WSBA #36077
Attorneys for GMC MORTGAGE, LLC

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on November 6, 2009. Service was accomplished by the method and to the following as indicated:

BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

Stephen Roger Nelson
Tracey Michelle Nelson
4617 Hilton NorthEast Avenue
Albuquerque, NM87110

Robert C Russell
Robert C Russell PC
12500 SE 2nd Circle Ste 130
Vancouver, WA 98684

Don Thacker
P.O. Box 5279
Vancouver, WA 98668

U.S. Trustee
Department of Justice
700 Stewart Street, Ste. 5103
Seattle, WA 98101

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on November 6, 2009, at San Diego, California.

/s/ Jennifer Branton
JENNIFER BRANTON